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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In re )  
 )  
Review of the Prime Time ) MM Docket No. 94-123  
Access Rule, Section )  
73.658(k) of the Commission's )  
Rules )

JOINT COMMENTS IN SUPPORT OF MOTION FOR EXTENSION  
OF TIME TO FILE COMMENTS

CapCities/ABC, Inc. ("CapCities/ABC"), CBS Inc. ("CBS") and National Broadcasting Company, Inc. ("NBC") hereby support the motion for a 60-day extension of time to file comments in the above proceeding that was filed on November 29 by the Association of Independent Television Stations, Inc., Viacom, Inc. and King World Productions, Inc. We do so reluctantly because we firmly believe that a reassessment of the Prime Time Access Rule, 47 C.F.R. §73.658(k) ("PTAR") is long overdue. However, we agree with the moving parties that it will be impossible to provide the Commission with the rigorous economic analysis and the supporting data it specifically seeks in the time allotted by the Notice of Proposed Rulemaking. ("Notice").

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CapCities/ABC, CBS and NBC welcome the thorough and expeditious review of PTAR that the Commission proposes in this proceeding. We also welcome the Commission's request in the Notice for comprehensive economic data regarding the effect of PTAR, and the Commission's stated interest in reassessing PTAR based on a systematic analysis of this data.

Following the release of the Notice on October 25, we decided to contract jointly for a responsive economic study, and proceeded to have preliminary discussions with various economic experts. Although we initially hoped that it would be feasible to obtain an appropriate study within the original time schedule, each of the economists whom we consulted advised us that it would be impossible to complete within the time frame contemplated in the Notice because of the breadth and depth of the issues it raises.

We have now engaged Economists Incorporated, a firm with long experience and significant expertise in economic analysis of communications markets, to produce such a study. That firm has confirmed to us that it needs until early March to perform the work required to produce an analysis that is fully responsive to the economic framework suggested by the Notice.

Under the circumstances, we reluctantly have come to the conclusion that an extension of the comment date to March 7, 1995 is necessary. Only if sufficient time is allowed for the preparation of responsive economic studies, and the preparation of comments which incorporate their analyses and conclusions, will the Commission have the benefit of the comprehensive record that it seeks to support timely action in this important proceeding.

Respectfully submitted,

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December 1, 1994

Certificate of Service

I, Mark W. Johnson, certify that a copy of the foregoing Joint Comments In Support Of Extension Of Time To File Comments was sent this 1st day of December, 1994, via hand delivery, to each of the following:

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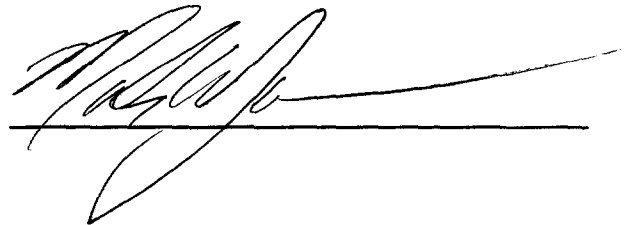
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A handwritten signature in black ink, appearing to read 'R. Pepper', is written over a horizontal line.